

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

Fond Du Lac Bumper Exchange, Inc., and Roberts
Wholesale Body Parts, Inc. on Behalf of Themselves
and Others Similarly Situated,

Plaintiffs,

v.

Jui Li Enterprise Company, Ltd., et al.,

Defendants.

Case No. 2:09-cv-00852-LA

**NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF
DIRECT PURCHASER PLAINTIFFS' SETTLEMENT WITH
GORDON AUTO BODY PARTS CO., LTD.**

TO THE COURT AND DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Direct Purchaser Plaintiffs ("DPPs") will, and hereby do, move this Court for an order (1) granting preliminary approval of a settlement (the "Settlement") with Gordon Auto Body Parts Co., Ltd; (2) certifying a settlement class (the "Settlement Class"); (3) appointing Fond du Lac Bumper Exchange, Inc. and Roberts Wholesale Body Parts, Inc. as the Settlement Class Representatives; (4) appointing Interim Co-Lead Counsel and Interim Liaison Counsel as Co-Lead Settlement Class Counsel and Liaison Settlement Class Counsel, respectively; (5) directing dissemination of notice of the Settlement to the members of the Settlement Class to give them the opportunity to exclude themselves from the class or object to the Settlement; and (6) setting a schedule for final approval of the Settlement.

This motion is made on the grounds that the Settlement is within the range of possible approval sufficient to justify sending notice of the Settlement to the Settlement Class and holding a hearing to determine whether the Court should grant final approval of the Settlement.

This motion is based on the accompanying Memorandum in Support of Direct Purchaser Plaintiffs' Motion for Preliminary Approval of Settlement with Gordon Auto Body Parts Co., Ltd. and supporting declarations of Jason S. Hartley and Carla A. Peak, and on any documentary evidence that may be presented at hearing on this motion.

Dated: April 30, 2015

Respectfully submitted,

By: s/ Jason S. Hartley
Jason S. Hartley
STUEVE SIEGEL HANSON, LLP
500 West C Street, Suite 1750
San Diego, CA 92101
Telephone: (619) 400-5822
Facsimile: (619) 400 5832
Email: hartley@stuevesiegal.com

Vincent J. Esades
Jessica N. Servais
HEINS MILLS & OLSON, P.L.C.
310 Clifton Avenue
Minneapolis, MN 55403
Telephone: (612) 338-4605
Facsimile: (612) 338-4692
Email: vesades@heinsmills.com
jservais@heinsmills.com

*Direct Purchaser Plaintiffs' Interim Co-
Lead Counsel*

K. Scott Wagner (SBN 1004668)
HALE & WAGNER, S.C.
839 N. Jefferson St., Suite 400
Milwaukee, WI 53202
Telephone: (414) 278-7000
Facsimile: (414) 278 7590
Email: ksw@halewagner.com

*Direct Purchaser Plaintiffs' Interim
Liaison Counsel*